

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARDO LEON,
[DOB: 09/19/1999]

Defendant.

Case No. 4:24-00257-01-CR-W-HFS

COUNT ONE:

Production of Child Pornography

18 U.S.C. §§ 2251(a), (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class B Felony

COUNT TWO:

Distribution of Child Pornography

18 U.S.C. §§ 2252(a)(2), (b)(1)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

Criminal Forfeiture Allegation

18 U.S.C § 2253(a) (Forfeiture)

\$100 Mandatory Special Assessment
Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Production of Child Pornography)

Between on or about August 1, 2024, and September 2, 2024, the dates being approximate, in the Western District of Missouri and elsewhere, LEONARDO LEON, defendant herein, did employ, use, persuade, induce, entice, and coerce MINOR VICTIM to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having

reason to know that such visual depiction would be transported in and using any means and facility of interstate and foreign commerce, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO
(Distribution of Child Pornography)

On or about September 10, 2024, in the Western District of Missouri and elsewhere, LEONARDO LEON, defendant herein, using any means or facility of interstate or foreign commerce, knowingly distributed a visual depiction, that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, and attempted to do so, in violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

FORFEITURE ALLEGATION

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, the defendant shall forfeit to the United States of America:

1. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, 2252, 2252A or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported,

mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110;

2. Any property, real or personal, constituting, or traceable to gross profits or other proceeds obtained from the offense; and
3. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, or any property traceable to such property.

The property to be forfeited includes but is not limited to: a grey Apple iPhone taken from the person of the defendant on October 2, 2024.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty,

The United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), and by Title 28, United States Code, Section 2461(c).

A TRUE BILL.

November 7, 2024
DATE

SIGNATURE ON FILE WITH USAO
FOREPERSON OF THE GRAND JURY

/s/Kenneth W. Borgnino
Kenneth W. Borgnino
Assistant United States Attorney
Special Victims Unit
Western District of Missouri